

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRUCE RUSH, as a participant in and on)	
Behalf of the Segerdahl Corporation)	
Employee stock ownership plan, and on)	
Behalf of a class of all others who are)	
Similarly situated,)	Case No. 1:19-cv-00738
)	
Plaintiff,)	Judge Andrea R. Wood
)	Magistrate Judge Susan E. Cox
v.)	
)	
GREATBANC TRUST COMPANY, <i>et al.</i> ,)	
)	
Defendants.)	

**NON-PARTIES STOUT RISIUS ROSS, LLC, ANDREW WARD, AND MIKE
POTERACKI’S MOTION FOR PROTECTIVE ORDER TO QUASH SUBPOENAS**

Pursuant to Federal Rules of Civil Procedure 26(c) and 45(d)(3), nonparties Stout Risius Ross, LLC (“Stout”), Andrew Ward, and Mike Poteracki (each a “Stout Party” and collectively the “Stout Parties”) move this Court for a protective order to quash two of the three subpoenas for deposition served by Plaintiff Bruce Rush (“Plaintiff”) on November 25, 2020 that seek the deposition testimony of Stout, Mr. Ward, and Mr. Poteracki. Because these subpoenas impose an undue burden, seek duplicative and cumulative discovery from the Stout Parties, and, as to the Rule 30(b)(6) deposition of Stout, are improper, the subpoenas directed to Stout and Mr. Poteracki must be quashed. As the Stout Parties have communicated to Plaintiff, however, the Stout Parties maintain that Mr. Ward will be available for a deposition on a mutually agreeable date. Further, the November 25, 2020 subpoenas require the Stout Parties to produce documents. Stout, however, already responded to Plaintiff’s subpoena *duces tecum*, and therefore the subpoenas seek cumulative and duplicative document discovery and constitute an undue burden.

WHEREFORE, for the reasons set forth in the accompanying memorandum in support of this Motion, the Stout Parties respectfully request this Court enter a protective order quashing the subpoenas directed to Stout in its Rule 30(b)(6) capacity and Mr. Poteracki in their entirety and the subpoena directed to Mr. Ward to the extent it requests that he produce documents.

Dated: December 14, 2020

Respectfully Submitted,

/s/

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LLC, Andrew Ward, and Michael Poteracki*

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically with the Court on December 14, 2020. Service will be made by the Court's electronic notification system, and all parties may access this filing through the Court's system.

/s/

Attorney for Non-Parties Stout Risius Ross, LLC, Andrew Ward, and Michael Poteracki